

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDGE CASTEL

UNITED STATES OF AMERICA

:

-v.-

: INDICTMENT

JESSE JAMES,

: 09 Cr.

a/k/a "Bernard Cullen,"

a/k/a "jessejamesphilly@verizon.net"

Defendant.

09 CRIM 781

:

COUNT ONE

The Grand Jury charges:

1. On or about February 17, 2009, in the Southern District of New York and elsewhere, JESSE JAMES, a/k/a "Bernard Cullen," a/k/a jessejamesphilly@verizon.net, the defendant, unlawfully, willfully, and knowingly did transmit in interstate commerce communications containing threats to injure the person of another, to wit, JAMES, who was located in Philadelphia, Pennsylvania, placed telephone calls and sent an email to an individual located in New York, New York, threatening to inflict physical harm upon him.

(Title 18, United States Code, Section 875(c).)

COUNT TWO

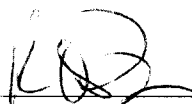
The Grand Jury further charges:

2. On or about February 17, 2009, in the Southern District of New York and elsewhere, JESSE


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JAMES, a/k/a "Bernard Cullen," a/k/a jessejamesphilly@verizon.net, the defendant, unlawfully, willfully, knowingly, and with intent to kill, injure, harass, and to place under surveillance with intent to kill, injure, harass, and intimidate, and to cause substantial emotional distress to a person in another State, and to place a person in another State in reasonable fear of the death of, and serious bodily injury to that person, did use an interactive computer service, and a facility of interstate commerce to engage in a course of conduct that did cause substantial emotional distress to that person and did place that person in reasonable fear of the death of, and serious bodily injury to, that person, to wit, JAMES, who was located in Philadelphia, Pennsylvania, sent harassing and threatening communications in the form of telephone calls and an email message to an individual (the "Victim") located in New York, New York, causing substantial emotional distress to the Victim, and placing the Victim in reasonable fear for the Victim's physical safety.

(Title 18, United States Code, Section 2261A(2).)



FOREPERSON



PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JESSE JAMES,
a/k/a "Bernard Cullen,"
a/k/a "jessejamesphilly@verizon.net,"

Defendant.

INDICTMENT

09 Cr.

(18 U.S.C. §§ 875, 2261A)

PREET BHARARA

United States Attorney.

A TRUE BILL



Foreperson.

*Indictment filed, case assigned
to Judge Castel.*

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